

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

<b>JASON THOMAS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 3:13-cv-262</b>
	)	
<b>INTEGRITY FINANCIAL PARTNERS,</b>	)	
<b>INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT INTEGRITY SOLUTION SERVICES, INC. F/K/A INTEGRITY  
FINANCIAL PARTNERS, INC.'S NOTICE OF REMOVAL**

TO THE HONORABLE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF OHIO:

Defendant removes this action to the United States District Court for the Southern  
District of Ohio, pursuant to 28 U.S.C. §§ 1441 and 1446(a). This Court has jurisdiction over  
this matter pursuant to 28 U.S.C. §§ 1331 and 1367.

**A. Introduction**

1. Plaintiff is Jason Thomas ("Thomas").
2. Defendant is Integrity Solution Services, Inc. f/k/a Integrity Financial Partners,  
Inc. ("Integrity").
3. This case was initially filed on or about July 3, 2013, in the Municipal Court of  
Clark County, Ohio, as Case Number 13-CVF-01806.
4. Thomas seeks damages for alleged violations of the Fair Debt Collection  
Practices Act (FDCPA), Telephone Consumer Protection Act (TCPA), and Ohio

Consumer Sales Practices Act. A copy of Plaintiff's Summons and Petition is attached.

5. Integrity was served with the lawsuit on or about July 8, 2013.
6. Integrity files this notice of removal within the 30-day time period required by 28 U.S.C. § 1446(b).

B. Basis for Removal

7. Removal is proper because Thomas' Complaint involves a federal question. 15 U.S.C. §§ 1692 et seq.; *Long v. Bando Mfg. of Am., Inc.*, 201 F.3d 754, 757-58 (6th Cir. 2000); *Peters v. Union Pac. R.R.*, 80 F.3d 257, 260 (8th Cir. 1996).
8. Thomas' Complaint contains a claim against Integrity arising under 15 U.S.C. §§ 1692, *et seq.*, for alleged violation of the FDCPA. This Court has federal subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d).
9. All pleadings, process, orders, and other filings in the state court action are attached to this notice as required by 28 U.S.C. § 1446(a).
10. Venue is proper in this district under 28 U.S.C. § 1441(a) because this district and division embrace the place where the removed action has been pending.
11. Integrity will promptly file a copy of this Notice of Removal with the clerk of the state court where the action has been pending and serve a copy of this Notice on Thomas, who is presently proceeding *pro se*.

C. Jury Demand

12. Thomas did not demand a jury trial in his Petition. Integrity denies that Thomas has any claim herein, and therefore, denies that he is entitled to Trial by Jury.

D. Conclusion

13. Integrity hereby removes this action to the United States District Court for the Southern District of Ohio.

This the 7th day of August, 2013.

Respectfully Submitted,

s/Jeffrey C. Turner  
Jeffrey C. Turner (0063154)  
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*Trial Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed, via U.S. mail, first class postage prepaid, this 7th day of August, 2013, to:

Jason Thomas  
4988 Troy Road  
Springfield, OH 45502  
PRO SE PLAINTIFF

s/Jeffrey C. Turner  
Jeffrey C. Turner